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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

IN RE AMAZON CONSUMER SPEECH  
LITIGATION

Master File No. 2:24-cv-00089-HDV(Ex)

**JOINT STIPULATION TO EXTEND  
DEADLINES**

This Document Relates to: All Actions

[Filed concurrently with Proposed Order]

Judge: Hon. Hernán D. Vera  
Ctrm: 5B

1 Plaintiffs Marcos Ramos, Shara Antrim, Elda Soto, Marissa Barriga, Esme  
2 Nicolson-Singh, and Barbara Trevino (“Plaintiffs”) and Defendants AMAZON.COM,  
3 INC., AMAZON.COM SERVICES LLC, AMAZON.COM SERVICES INC.,  
4 AUDIBLE, INC., and ALEXA INTERNET (“Defendants”) (collectively, the “Parties”)  
5 have met and conferred by and through their respective counsel, as required by Local  
6 Rule 7-3, and hereby stipulate as follows:

7 WHEREAS Plaintiffs filed their Consolidated Class Action Complaint  
8 (“Consolidated Complaint”) on May 16, 2024.

9 WHEREAS Defendants filed a Motion to Dismiss Plaintiffs’ Consolidated  
10 Complaint on June 17, 2024.

11 WHEREAS, Plaintiffs filed a Motion to Remand on July 2, 2024.

12 WHEREAS the Court denied Defendants’ Motion to Dismiss Plaintiffs’  
13 Consolidated Complaint and Plaintiffs’ Motion to Remand on November 11, 2025.

14 WHEREAS the Court held a Scheduling Conference on March 4, 2025, which set  
15 a deadline to hear any Motion for Class Certification on October 2, 2025.

16 WHEREAS, at the Scheduling Conference, Plaintiffs indicated that their ability to  
17 bring a Motion for Class Certification to be heard by October 2, 2025, was dependent on  
18 whether they could obtain necessary discovery sufficiently in advance of their Motion for  
19 Class Certification filing deadline. *See* Joint 26(f) Report, ECF No. 53.

20 WHEREAS, Amazon likewise needs discovery from Plaintiffs sufficiently in  
21 advance of its deadline for opposing class certification.

22 WHEREAS, the Parties engaged in extensive negotiations regarding a stipulated  
23 protective order and ESI protocol and have submitted to the Court agreed proposed  
24 orders. The Parties have been actively meeting and conferring regarding their respective  
25 document productions and other discovery disputes, certain of which could not be  
26 resolved until they reached agreement on the proposed protective order and ESI protocol.

27 WHEREAS, now that the protective order and ESI protocol are agreed to, Plaintiffs  
28 anticipate receiving documents from Amazon that may be relevant to their Motion for

Class Certification, and Amazon anticipates receiving documents from Plaintiffs that may be relevant to its Opposition to Plaintiffs’ Motion for Class Certification.

WHEREAS, the Parties have made no prior requests for a continuance of case deadlines.

WHEREAS on May 1, 2025 Amazon filed a Motion for Judgment on the Pleadings, and is set to be heard on July 31, 2025. This stipulation will not affect that hearing date.

WHEREAS, in consideration of the above, and to permit the Parties time to resolve outstanding discovery disputes, obtain relevant discovery, and navigate conflicts over the holidays, the Parties have agreed that the deadlines in this case should be extended as follows:

| Trial and Final Pretrial Conference Dates  | Prior Date | New Date   |
|--|------------|------------|
| Jury Trial<br>( <b><u>Tuesday</u></b> at 9:00 a.m.)<br>Estimated Duration: 5 Days                | 6/23/2026  | 11/3/2026  |
| Final Pretrial Conference (“FPTC”) [L.R. 16]<br>( <b><u>Tuesday</u></b> at 10:00 a.m.)           | 6/02/2026  | 10/13/2026 |
| Hearing on Motions <i>In Limine</i>  | 5/28/2026  | 10/8/2026  |
| Event  |            |            |
| Fact Discovery Cut-Off<br>( <b>no later than deadline for <i>filing</i> dispositive motion</b> ) | 12/16/2025 | 4/28/2026  |
| Expert Disclosure (Initial)  | 12/23/2025 | 5/5/2026   |
| Expert Disclosure (Rebuttal)   | 1/06/2026  | 5/19/2026  |
| Expert Discovery Cut-Off   | 1/20/2026  | 6/2/2026   |

|   |            |   |
|---|------------|---|
|   |            |   |
| <b>Last Date to <i>Hear</i> Motion for Class Certification</b> <ul style="list-style-type: none"> <li>• Deadline to File Motion</li> <li>• Opposition Deadline</li> <li>• Reply Deadline</li> </ul>   | 10/02/2025 | 4/2/26 <ul style="list-style-type: none"> <li>• 1/8/26</li> <li>• 2/19/26</li> <li>• 3/12/26</li> </ul> |
| <b>Last Date to <i>Hear</i> Motions</b>   | 3/19/2026  | 7/30/2026   |
| <b>Deadline to Complete Settlement Conference [L.R. 16-15]</b> <ul style="list-style-type: none"> <li>• ADR Selection: <ul style="list-style-type: none"> <li>[ ] 1. Magistrate Judge</li> <li>[ ] 2. Court's Mediation Panel</li> <li>[X] 3. Private Mediation</li> </ul> </li> </ul>  | 4/21/2026  | 9/2/2026  |
| <b>Trial Filings (first round)</b> <ul style="list-style-type: none"> <li>• Motions In Limine</li> <li>• Memoranda of Contentions of Fact and Law [L.R. 16-4]</li> <li>• Witness Lists [L.R. 16-5]</li> <li>• Joint Exhibit List [L.R. 16-6.1]</li> <li>• Joint Status Report Regarding Settlement</li> <li>• Proposed Findings of Fact and Conclusions of Law [L.R. 52] (<i>court trial only</i>)</li> <li>• Declarations containing Direct Testimony, if ordered (<i>court trial only</i>)</li> </ul> | 5/05/2026  | 9/15/2026   |
| <b>Trial Filings (second round)</b> <ul style="list-style-type: none"> <li>• Oppositions to Motions In Limine</li> <li>• Joint Proposed Final Pretrial Conference Order [L.R. 16-7]</li> <li>• Joint/Agreed Proposed Jury Instructions (<i>jury trial only</i>)</li> <li>• Disputed Proposed Jury Instructions (<i>jury trial only</i>)</li> <li>• Joint Proposed Verdict Forms (<i>jury trial only</i>)</li> <li>• Joint Proposed Statement of the Case (<i>jury trial only</i>)</li> </ul>            | 5/19/2026  | 9/29/2026   |

- |   |  |  |
|---|--|--|
| <ul style="list-style-type: none"><li>• Proposed Additional Voir Dire Questions, if any (<i>jury trial only</i>)</li><li>• Evidentiary Objections to Decls. of Direct Testimony (<i>court trial only</i>)</li></ul> |  |  |
|---|--|--|

THEREFORE, the Parties respectfully request that the Court enter the accompanying proposed order, extending all deadlines in this case.

IT IS SO STIPULATED.

DATED: July 11, 2025

Respectfully submitted,

/s/ Robert Ahdoot

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**ATTESTATION OF FILER**

I HEREBY ATTEST that all signatories above have reviewed and concur with the filings of this document.

Dated: July 11, 2025

/s/ Christopher E. Stiner

Christopher E. Stiner

**CERTIFICATE OF SERVICE**

I, Christopher E. Stiner, hereby certify that on July 11, 2025, the foregoing document was filed via the Court's CM/ECF system, which will automatically serve and send email notification of such filing to all registered attorneys of record.

/s/ Christopher E. Stiner

Christopher E. Stiner